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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**FURTHER SUBMISSION IN
RESPONSE TO QUESTION 7 IN
FOLLOW-UP QUESTIONS RE DIXIE
AND FLY FIRES**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this further submission in response to Question 7 in the Court’s August 17, 2021 order (Dkt. 1417).

Question 7:

Please provide copies of all reports and memos and emails regarding the site visit on April 16, 2021, regarding the plan for under-grounding the circuit and all reports and memos and emails summarizing, describing or referring to the need to do so or the proposal to do so or the problem leading to such proposals.

PG&E Further Response:

Consistent with PG&E’s August 31, 2021 submission, PG&E delivered to the Court on August 31, 2021 a thumb drive containing electronic copies of 2,044 documents bearing Bates PGE-DIXIE-NDCAL-0000001 to PGE-DIXIE-NDCAL-000008582 that PG&E has identified as responsive to this request. PG&E is making its additional production described in the August 31, 2021 submission by delivering to the Court on September 3, 2021 a second thumb drive containing 2,054 documents that PG&E has identified as responsive to this request bearing Bates PGE-DIXIE-NDCAL-000008583 to PGE-DIXIE-NDCAL-000017010.¹ PG&E is also producing additional documents identified as relating to the system hardening project for the Bucks Creek 1101 distribution circuit approved by the Wildfire Risk Governance Steering Committee in January 2021 (the “Bucks Creek 1101 System Hardening Project”). The second thumb drive includes indexes identifying the Bates range for each document family in the August 31, 2021 and September 3, 2021 productions.

Together with various PowerPoint presentations, PG&E is producing approximately 1,000 embedded Excel files containing data related to graphs and charts in those presentations. If the Court prefers, PG&E can produce an alternative set of the documents without the embedded Excel files.

¹ As set forth in PG&E’s August 31, 2021 submission, PG&E does not interpret the Court’s question as calling for information protected by the attorney-client privilege or attorney work product protection. Where applicable, PG&E is redacting portions of documents determined to be protected by attorney-client privilege or to constitute attorney work product.

As set forth in PG&E's August 31, 2021 submission, certain documents being provided to the Court contain personally identifying information and other confidential information. PG&E is in the process of identifying this confidential information and will prepare and deliver a redacted set and file a corresponding administrative motion to seal.

Dated: September 3, 2021

Respectfully Submitted,

JENNER & BLOCK LLP

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